

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 1:20-CR-183

Hon. Robert J. Jonker
Chief U.S. District Court Judge

ADAM FOX,
BARRY CROFT, JR.,
DANIEL HARRIS,
KALEB FRANKS, and
BRANDON CASERTA,

Defendants.

JOINT PROPOSED JURY QUESTIONNAIRE

Defendants by Kaleb Franks, through counsel Scott Graham, and on behalf of all parties in this matter, offers the following proposed extended juror questionnaire, following his July 12, 2021 motion for leave to propose an extended juror questionnaire, codefendants' joining in that motion, and the Court's granting leave to submit such a proposed questionnaire. *See* RE. 228: Motion to Allow Submission of Juror Questionnaire, PageID # 1261-64; *see also* RE. 257: Order, PageID # 1399.

Counsel has consulted with the government and to portions to which it objects are noted in bold-face, underlined text.

Respectfully Submitted,

Dated: September 2, 2021

/s/ Scott Graham
SCOTT GRAHAM
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Portage, MI 49024-5399
sgraham@scottgrahampllc.com
(269) 327-0585

Case Introduction

As a potential juror in this case, you may feel some curiosity about the parties involved and the accusations in play. This section will give you a quick look at what this case involves. But before you consider the charges, it's important to remember that in our system of criminal justice (and this is a criminal case), a person is presumed innocent. Just because the government has accused them of something does *not* mean they are guilty. In fact, the government's accusations mean nothing until the government proves—beyond a reasonable doubt—that the accusations are true. And that's where you would come in. As a juror, it would be up to you to decide whether the government had carried its burden and proved—again, beyond a reasonable doubt—that the people on trial had indeed done what the government had accused them of doing.

So that's where we start: the defendants are innocent until proven guilty. Next, we can discuss the government's accusations. Here, the government has charged the defendants with conspiring to kidnap the governor of Michigan. It has also alleged that some (but not all) the defendants conspired to use weapons of mass destruction to blow up a bridge in Northern Michigan and that some (but not all) of the defendants possessed “destructive devices” or illegal firearms. The government has alleged that the defendants wanted to take these actions because of the governor's unconstitutional lockdown orders during the COVID-19 pandemic. Each

defendant has denied the allegations, and again, they are presumed innocent.

General Instructions

So now, you come in. This questionnaire aims to help the Court get a better feel for your position on the issues involved in this case and any exposure you've had to media reports related to these matters. The questions here are not intended to unnecessarily inquire into personal matters, and all information obtained will be kept confidential and under seal.

You are sworn to give true and complete answers. Your answers will be available only to the Court and the attorneys for the parties. The individual questionnaires themselves belong to the Court, and all copies will be returned to the Court. **Please do not discuss this case or your questionnaire with anyone, including your family, fellow jurors, and the media.**

Although some of the questions may appear very personal, please understand that the Court and the parties must learn enough information about each potential juror's background and experiences to select a fair and impartial jury. Your cooperation is vital. Please answer each question as fully and completely as possible. Your complete candor and honesty are necessary, so that **both the prosecution and the defense [government requests "both sides"]** will have a meaningful opportunity to select an impartial jury. You must answer all questions to the best of your ability. If you do not know the answer to a question, you can write "I don't know." If the question does

Juror Number: _____

not apply to you, write “N/A.” Please fill out the entire questionnaire, and **DO NOT LEAVE ANY QUESTION BLANK**. It is important that the answers be yours alone. If you need more space for your responses, or want to explain any of your answers, please use the Explanation Sheets at the end of this questionnaire. Please identify the question you are answering on the Explanation Sheet before you write your response or comment. Please do not write on the back of any sheet.

Also, please keep in mind that there are no “right” or “wrong” answers. Complete answers are far more helpful than incomplete answers. And also please remember that *you are sworn to give true and complete answers to all questions*.

Unless the question states otherwise, the fact that a particular question is asked does *not* imply that the subject matter of the question is an issue in this case. As you read the questions, you should *not* draw any conclusions about the issues in this case.

PLEASE PRINT OR WRITE LEGIBLY. And again, please do not write on the back of any sheet of this questionnaire. Please be sure to put your juror number on each page. When you have finished answering these questions, you must sign your name. On that signature page, you are affirming the accuracy of your answers. That page will be removed by court staff and will not be shown to any party.

Juror Questionnaire

Juror Number: _____

Section I: Personal Background

Juror's Number: _____

1. Gender: _____

2. Age: _____

3. Place of Birth: _____

4. **What is your ethnic background?**

_____ **White/Caucasian (not Hispanic)**
_____ **Black/African-American (not Hispanic)**
_____ **Hispanic/Latino**
_____ **Asian or South Asian**
_____ **American Indian or Native American**
_____ **Other** (please specify)

5. In what town, city, or county do you currently live? _____

6. Length of time at current address: _____

7. How long have you lived in Western Michigan? _____

8. If you have lived less than five years at your current address, please indicate your prior town or community.

9. Have you lived outside of Michigan at any time?

_____ Yes _____ No

If so, for how long (total)?

_____ Less than a year _____ Between 1 and 5 years

_____ Between 5 and 10 years _____ More than 10 years

10. What is your current marital/domestic status? (Check all that apply.)

Juror Number: _____

_____ Married _____ Divorced _____ Widowed

_____ Separated _____ Divorced & Remarried

_____ Domestic Partnership _____ Widowed & Remarried

_____ Single _____ Single Living with Someone/Others
(including roommates)

_____ Married/In Partnership and Also Living with Others _____ Other

11. If you have children or stepchildren, please list them:

	<u>Sex</u>	<u>Age</u>	<u>Live with you?</u>	<u>Education Level</u>	<u>Occupation</u>
1.					
2.					
3.					
4.					
5.					

12. Do you read, speak, write, and understand English?

____ Yes, without difficulty

____ Yes, with difficulty

No

13. Are you a U.S. Citizens?

Yes No

14. What is your occupational status? (Check all that apply.)

_____ Work full-time outside the home _____ Student

Work part-time outside the home	Retired
---------------------------------	---------

Full-time homemaker	Disabled
---------------------	----------

_____ Homemaker + part-time employment _____ Unemployed

Other (please explain): _____

Juror Number: _____

15. If you are a student, what type of school do you attend (undergraduate, graduate, technical, vocational, business)?

Are you:

Full-time _____ Part-time _____

16. Without giving your place of employment, please state your current occupation and duties:

17. Do you manage people?

_____ Yes _____ No

If yes, how many people? _____

18. How long have you held this job? _____

19. Please list all prior occupations or jobs during the past 5 years:

<u>Occupation</u>	<u>Length of Employment</u>

20. If you are married/in a domestic partnership, what is your spouse's/significant other's occupation?

_____ Work full-time outside the home _____ Student
_____ Work part-time outside the home _____ Retired
_____ Full-time homemaker _____ Disabled

Juror Number: _____

_____ Homemaker + part-time employment _____ Unemployed
 _____ Other (please explain): _____

21. Without giving their place of employment, please state their current occupation and duties:

22. Check the highest level of education for you and your spouse/domestic partner/significant other:

	<u>You</u>	<u>Spouse/domestic partner/significant other</u>
(a) Grade school or less	_____	_____
(b) Some high school	_____	_____
(c) High-school graduate	_____	_____
(d) Technical or business school	_____	_____
(e) Some college	_____	_____
(f) College degree	_____	_____
(g) Graduate work or degree	_____	_____

23. Do you have any education, training or employment experience in any of the following fields:

	<u>Yes</u>	<u>No</u>	<u>Some</u>
(a) Security, intelligence	_____	_____	_____
(b) Private investigations	_____	_____	_____
(c) Law	_____	_____	_____
(d) Medicine	_____	_____	_____
(e) Psychology, psychiatry, or social work	_____	_____	_____
(f) Corrections (work in prisons/jails)	_____	_____	_____
(g) Religion and/or philosophy	_____	_____	_____
(h) Criminal justice	_____	_____	_____
(i) Journalism, media, communications	_____	_____	_____
(j) Computer or information technology	_____	_____	_____
(k) Law enforcement	_____	_____	_____

Juror Number: _____

If yes, please explain the nature and extent of the education, training, or employment experience: _____

24. Does your spouse/domestic partner/significant other, or another member of your immediate family, have any education, training, or employment experience in any of the following fields:

	<u>Yes</u>	<u>No</u>	<u>Some</u>
(a) Security, intelligence	_____	_____	_____
(b) Private investigations	_____	_____	_____
(c) Law	_____	_____	_____
(d) Medicine	_____	_____	_____
(e) Psychology, psychiatry, or social work	_____	_____	_____
(f) Corrections (work in prisons/jails)	_____	_____	_____
(g) Religion and/or philosophy	_____	_____	_____
(h) Criminal justice	_____	_____	_____
(i) Journalism, media, communications	_____	_____	_____
(j) Computer or information technology	_____	_____	_____
(k) Law enforcement	_____	_____	_____

If yes, please explain the nature and extent of the education, training, or employment experience: _____

25. Have you ever received in-patient treatment, or been under a doctor's care, for any type of mental or psychiatric condition, including mood disorders, or treatment for alcohol or drug abuse?

Juror Number: _____

Section II: Firearms and Explosives

1. Do you own a firearm?

_____ Yes _____ No

2. Does anyone else in your household own a firearm?

_____ Yes _____ No

3. Do you hunt/have you hunted? (Check all that apply.)

_____ Yes, with a firearm

_____ Yes, with a bow

_____ Yes, with another weapon

_____ No

4. Does anyone in your household (including you) have a permit to carry a concealed weapon (CCW/CPL)?

_____ Yes _____ No

5. Do you have experience or training with explosive devices?

_____ Yes _____ No

If so, please explain:

6. Please explain your view on whether citizens should have the right to bear arms.

Juror Number: _____

7. Do you belong to, or have you donated anything of value to, any organization that advocates with regard to the Second Amendment or gun control?

_____ Yes _____ No

Please explain: _____

Juror Number: _____

Section III: Military Service

1. Have you (or has anyone in your household) ever served in the armed forces, including the reserves, National Guard, or ROTC?

_____ Yes _____ No

If yes, please answer the following:

	<u>You</u>	<u>Spouse/ Partner</u>
(a) Branch and highest rank	_____	_____
(b) Dates of service	_____	_____
(c) Place of service	_____	_____
(d) Type of discharge	_____	_____
(e) Any experience with courts martial, military police, shore patrol, or other area of military law enforcement?	_____	_____
(f) Did you or they have any combat experience?	_____	_____

If so, identify location and years: _____

Juror Number: _____

Section IV: Hobbies, Pastimes, Community Service, and Organizations

Please list organizations to which you or your spouse or domestic partner or significant other belong, or in which either of you participate (or in which you have participated within the past five years). (Please, include any civic, social, religious, charitable, volunteer, political, sporting, professional, business, union, fraternal, or recreational groups. For example, Kiwanis, Rotary Club, Knights of Columbus, Veterans of Foreign Wars, American Legion, American Civil Liberties Union, National Rifle Association, League of Women Voters, a local yacht or golf club, or a local sports organization.)

Self: _____

Spouse/domestic partner/significant other: _____

Have you ever held an office or title in any of these organizations?

_____ Yes _____ No

If yes, please list: _____

-

Have you, any member of your family or household, or any close friend ever run for, or held, an elected or appointed office in federal, state, or local government?

_____ Yes _____ No

If yes, please describe: _____

Juror Number: _____

Have you, any member of your family or household, or any close friend ever belonged to a militia?

_____ Yes _____ No

If so, what was the name of that militia?

Have you ever participated in a protest or civil demonstration?

_____ Yes _____ No

If yes, please describe: _____

Were you affected by the protests in Grand Rapids in the summer of 2020?

_____ Yes _____ No

If yes, please describe: _____

Juror Number: _____

Section V: COVID-19

1. During the 2020/2021 COVID-19 lockdowns **[Government proposes to call this a “restriction on activities”]**, was your employment affected? If so, how?

2. Do you have any concerns related to COVID-19, which would prevent you from being able to serve as a juror during a **6-to-8-week** trial?

3. Do you have any strong feelings about masks?

_____ Yes _____ No

If yes, please explain.

4. **Please explain your views on a citizen’s freedom of speech, association, and religion.**

5. Would a witness’s or attorney’s use of a mask affect your feelings about credibility?

_____ Yes _____ No

If yes, please explain.

6. Regarding Governor Whitmer’s leadership during the pandemic, please check all statements below that apply to you:

_____ I am relatively satisfied with how she has handled the pandemic

_____ I am relatively dissatisfied with how she has handled the pandemic

Juror Number: _____

_____ I feel neutral regarding how she has handled the pandemic

_____ I have strong positive feelings about how she has handled the pandemic

_____ I have strong negative feelings about how she has handled the pandemic

Juror Number: _____

Section VI: Prior Jury Service

1. Have you served as a juror before?

_____ Yes _____ No

If yes, please complete the following for each trial on which you served as a juror:

When did you serve?	In what court?	Criminal or Civil?	Charges/ Allegations?	What verdict did the jury reach?
1.				
2.				
3.				

2. Have you ever served as a jury foreperson?

_____ Yes _____ No

3. Have you ever had an experience with jury service or a jury summons that left you disappointed or dissatisfied with our justice system or jury service?

_____ Yes _____ No

If so, please explain:

Juror Number: _____

4. Have you ever served on a grand jury?

_____ If yes, please complete the following for each grand jury on which you served:

When did you serve?	In what court?
1.	
2.	
3.	

Juror Number: _____

Section VII: Media Exposure

To which of the following sources do you turn for news (please check all that apply)?

_____ Newspapers _____ Radio _____ Television _____ Blogs
_____ Facebook _____ Twitter _____ LinkedIn
_____ TikTok _____ Instagram _____ YouTube
_____ Huffington Post _____ News Websites like Yahoo News or Google News
_____ Media Websites like CNN's or Fox News' _____ Apple News
_____ None _____ Other

If other, please describe:

Which social-media platforms do you use (please check all that apply)?

_____ None _____ Facebook _____ Twitter _____ LinkedIn
_____ TikTok _____ Instagram _____ Pinterest _____ Reddit
_____ Snapchat _____ Messaging Apps like WhatsApp _____ Other
_____ Telegram

If other, please describe:

Juror Number: _____

Do you maintain, edit, or contribute to any newspapers, magazines, journals, blogs, YouTube accounts, or other media/news sources?

_____ Yes _____ No

If so, please explain:

Do you have a personal or professional website?

_____ Yes _____ No

If so____, please explain:

If you use social media, how often do you access your account(s)?

_____ Multiple times a day _____ Daily _____ A few times a week
_____ Weekly _____ A few times a month _____ Monthly
_____ Less than monthly

How often do you post to your account(s)?

_____ Multiple times a day _____ Daily _____ A few times a week
_____ Weekly _____ A few times a month _____ Monthly
_____ Less than monthly

Juror Number: _____

If you are chosen as a juror, and while you participate in the jury-selection process, you will not be permitted to read/listen to/watch any media or Internet coverage of this case and related subjects. Will you be able to comply with these restrictions?

_____ Yes _____ No

If not, please explain:

If you are chosen as a juror, and while you participate in the jury-selection process, you will not be permitted to make any sort of social-media posts about this case and related subjects. And you will not be permitted to discuss this case, and related subjects, with anyone. Will you be able to comply with these restrictions?

_____ Yes _____ No

If not, please explain:

Have you read/listened to/seen any news accounts related to the alleged conspiracy to kidnap Michigan Governor Gretchen Whitmer?

_____ Yes _____ No

If you have been exposed to any news accounts, how would you describe that exposure? (Please check all that apply.)

_____ I did not have exposure or pay attention to any news on this topic

_____ I saw/read/listened to one or two news pieces

_____ I followed the story when it first came out last year, but I haven't kept up with it

_____ I have read news accounts related to the story in the last few months

_____ I have read news accounts related to the story in the last few weeks

_____ I have paid close attention to the story

_____ I have seen news on this topic in passing, but I haven't sought it out

_____ I have sought out news on this topic

_____ I am familiar with the names of the parties/attorneys involved

_____ I would describe myself as relatively knowledgeable on the subject

Juror Number: _____

_____ I would not describe myself as relatively knowledgeable on the subject

_____ I have strong feelings about the way the media have handled the story (if you check this selection, please describe here)

Regarding news sources reporting on the alleged conspiracy, please check all statements that apply to you:

_____ I have not read/seen/listened to news stories on this topic

_____ I have read/seen/listened to news stories from NPR

_____ I have read news stories from BuzzFeed

_____ I have read news stories from local news sources, like MLive, ABC Chicago, and the Detroit Free Press

_____ I have seen/read news stories from social-media sources

_____ I have read/seen/listened to news stories from national news networks like The Washington Post and The New York Times

_____ I have seen/read/listened to news stories from other sources (please describe here)

Do you have any knowledge (from news sources or elsewhere) of topics related to:

_____ The Wolverine Watchmen _____ The 3%ers or Three Percenters

_____ The Boogaloo Bois or Boys or Movement

_____ Law-enforcement entrapment

_____ Law-enforcement use of undercover agents and informants

Given any exposure to news of this alleged conspiracy, do you have any feelings about the guilt or innocence of the alleged conspirators?

_____ I do not have an opinion on their guilt or innocence

_____ I have some feeling that they could be guilty

_____ I have some feeling that they are not guilty

_____ I have a strong feeling that they could be guilty

_____ I have a strong feeling that they are not guilty

Juror Number: _____

Given any exposure to news of this alleged conspiracy, do you have any feelings about the law-enforcement tactics used to conduct the undercover operation?

_____ I do not have an opinion on these tactics

_____ I have some feeling that the government overstepped the boundaries of ethical investigation

_____ I feel strongly that the government overstepped the boundaries of ethical investigation

_____ I do not feel that the government overstepped the boundaries of ethical investigation

Have you talked about these kidnapping-conspiracy allegations with friends or loved ones?

_____ Yes _____ No

Do you feel like your exposure to news stories on these topics would affect your ability to sit as an impartial juror in this case?

_____ Yes _____ No

Please explain your answer:

Juror Number: _____

Section VIII: Criminal Justice

1. Are you (or a member of your household or a close friend/relative) a member of a neighborhood crime-watch or prevention group?

_____ Yes _____ No

If yes, please identify the group and describe that participation: _____

2. Have you (or a member of your household or a close friend/relative) ever been the victim of, or a witness to, a crime, whether or not that crime was reported to law-enforcement authorities?

_____ Yes _____ No

If yes, please explain: _____

3. **Have you (or a member of your household or a close friend/relative) ever been the subject of a search by law enforcement, with or without a warrant?**

_____ Yes _____ No

If yes, please explain: _____

Juror Number: _____

4. Have you (or a member of your household or a close friend/relative) ever been questioned about, accused of, investigated for, arrested for, charged with, or convicted of a crime (other than a minor traffic offense)?

_____ Yes _____ No

If yes, please provide the following:

Relationship to person
charged (e.g., self, sister)

Crime(s) charged

Case outcome

5. Have you ever appeared in court, or in any legal proceeding (civil or criminal), as a plaintiff, defendant, victim, or witness for any reason other than as explained above?

_____ Yes _____ No

If yes, please explain: _____

6. _____ Do you have any strong feelings about local, state, or federal law enforcement?

_____ Yes _____ No

If yes, please explain: _____

7. **Do you believe that if the prosecution brings a person to trial, that person is probably guilty?**

_____ Yes _____ No _____ Unsure

8. **Do you believe that innocent people are sometimes convicted of**

Juror Number: _____

crimes they did not commit?

Yes No Unsure

Juror Number: _____

Section IX: Political Concerns

1. How would you describe any exposure you have had to media accounts of the January 6, 2021 events at the U.S. Capitol? (Please check all that apply.)

_____ I did not have exposure or pay attention to any news on this topic

_____ I saw/read/listened to one or two news pieces

_____ I followed the story when it first came out earlier this year, but I haven't kept up with it

_____ I have read news accounts related to the story in the last few months

_____ I have read news accounts related to the story in the last few weeks

_____ I have paid close attention to the story

_____ I have seen news on this topic in passing, but I haven't sought it out

_____ I have sought out news on this topic

_____ I would describe myself as relatively knowledgeable on the subject

_____ I would not describe myself as relatively knowledgeable on the subject

_____ I have strong feelings about the way the media have handled the story (if you check this selection, please describe here)

_____ I have strong feelings about the event (if you check this selection, please describe here)

2. Regarding the State of Michigan's government, please check all statements below that apply to you:

_____ I am relatively satisfied with how the state is governed generally

_____ I am relatively dissatisfied with how the state is governed generally

_____ I feel neutral with regard to how the state is governed generally

_____ I am relatively satisfied with Governor Whitmer's leadership

_____ I am relatively dissatisfied with Governor Whitmer's leadership

_____ I feel neutral with regard to Governor Whitmer's leadership

Juror Number: _____

3. With regard to the State of Michigan's government and Governor Whitmer's leadership, do you have any strong feelings that could prevent you from serving as an impartial juror in this case related to an alleged conspiracy to kidnap the governor?

_____ Yes _____ No

If yes, please explain: _____

Juror Number: _____

EXPLANATION SHEET #1

[illegible]

[illegible]

Juror Number: _____

AFFIRMATION

I, _____, hereby declare under penalty of perjury that the answers I have provided in this jury questionnaire are true and correct to the best of my knowledge. I have not discussed my answers with others or received assistance in completing the questionnaire. I have answered all the above questions in this questionnaire myself.

Executed in the Western District of Michigan, on this ____ day of September, 2021.

Signature

ATTACHMENT

Juror No: _____

SUMMARY OF CASE

~~The indictment alleges that the defendants in this case conspired to kidnap the Governor of Michigan. It also alleges that some of them conspired to use weapons of mass destruction to blow up a bridge in Northern Michigan and that some of the defendants possessed “destructive devices” or illegal firearms. The government’s theory of the case involves that the defendants were motivated to take such action in response to the Governor’s unconstitutional lockdown orders during the COVID-19 pandemic.~~

~~Defendants are charged with a number of offenses, including conspiracy to kidnap the Governor; conspiracy to use weapons of mass destruction; possession of destructive devices; and possessing a firearm not registered in the National Firearm Registration and Transfer Record. All of the defendants are not charged in every count. Some of the charged offenses include allegations against just one or two of the defendants. However, the exact charges will be more fully explained as the jury selection process proceeds.~~

~~Each defendant denies the allegations from the indictment and is presumed innocent of the government’s allegations.~~

Commented [A1]: The government objects to the inclusion of any summary of the case. Telling jurors what the case is about would likely corrupt the process of jury selection. If prospective jurors know what the case is about before they begin completing a questionnaire, they may alter their answers to fit their own personal interests in either serving or not serving on the jury.

Juror No: _____

General Instructions:

This questionnaire is designed to obtain information about you, to use in deciding your qualifications to serve as a juror in this case. The purpose of these questions is to determine whether prospective jurors can impartially decide this case based upon the evidence presented at trial and the instructions on the law given by the presiding judge. The questions are not intended to unnecessarily inquire into personal matters; all information obtained will be kept confidential and under seal.

You are sworn to give true and complete answers. Your answers will be available only to the court and the parties. The questionnaires belong to the court and all copies will be returned to the court. You are instructed not to discuss this case or the questionnaire with anyone, including your family, fellow jurors or the media.

Although some of the questions may appear to be of a personal nature, please understand that the Court and the parties must learn enough information about each juror's background and experiences to select a fair and impartial jury. Your cooperation is of vital importance. Please answer each question as fully and completely as possible. Your complete candor and honesty is necessary so that both ~~the prosecution and the defense sides~~ will have a meaningful opportunity to select an impartial jury.

You must answer all the questions to the best of your ability. If you do not know the answer to a question then write, "I don't know." If the question does not apply to you, write "N/A." Please fill out the entire Questionnaire. DO NOT LEAVE ANY QUESTION BLANK. It is important that the answers be yours alone. If you need more space for your responses or

Commented [A2]: If there is no summary of the case, then this sentence is superfluous, so the government asks that it be stricken.

Commented [A3]: Prospective jurors should not be able to determine whether they will be called in a civil or criminal case. Telling jurors the type of case could corrupt the process of jury selection. Accordingly, the government objects to the mention of "the prosecution and the defense." The language "both sides" makes the point of this sentence without revealing any case information.

Juror No: _____

wish to make further comments regarding any of your answers, please use the Explanation Sheet at the end of the questionnaire. Put the number of the question you are answering on the Explanation Sheet before you write your response or comment. Please do not write on the back of any sheet.

Please keep in mind that there are no “right” or “wrong” answers, only complete and incomplete answers. Complete answers are far more helpful than incomplete answers.

Remember, *you are sworn to give true and complete answers to all questions.*

Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question is an issue in this case. As you read the questions, you are not to draw any inferences about the issues which must be decided in this case. Do not write on the back of any page. **PLEASE PRINT OR WRITE LEGIBLY, and be sure to put your juror number on each page. When you have finished answering the Questionnaire, you must sign with your name. In that signature page you are affirming the accuracy of your answers. That page will be removed by court staff and will not be shown to any party.**

Juror No: _____

PERSONAL BACKGROUND

Juror's Number: _____

1. Gender: _____

2. Age: _____

3. Place of Birth:

4. What is your ethnic background?

☐ White/Caucasian, not Hispanic
☐ Black/African American, not Hispanic
☐ Hispanic/Latino
☐ Asian or South Asian
☐ American Indian or Native American
☐ Other _____
 (please specify)

Commented [A4]: The government objects to asking about race, ethnicity, and national origin in the juror questionnaire. The parties do not need advance notice of the racial or ethnic identity of prospective jurors in order to adequately prepare for voir dire.

5.4. In what town, city, or county do you currently live? _____

6.5. Length of time at current address: _____

7.6. How long have you lived in ~~Southeastern~~ West Michigan? _____

8.7. If you have lived less than five years at your current address, indicate your prior town or community.

9.8. What is your current marital/domestic status? **(Check all that apply.)**

☐ Single/never married ☐ Divorced
☐ Married years ☐ Divorced and remarried
☐ Domestic partner ☐ Widowed
☐ Separated ☐ Lives with others

Juror No: _____

~~40-9.~~ If you have children or stepchildren, please list them:

	<u>Sex</u>	<u>Age</u>	<u>Live with you?</u>	<u>Education Level</u>	<u>Occupation</u>
1.					
2.					
3.					
4.					
5.					

~~44-10.~~ Do you read, speak, write, and understand English?

- ☐ Yes, without difficulty
☐ Yes, with difficulty
☐ No

~~42-11.~~ Are you a U.S. Citizens?Yes ☐ No ☐~~43-12.~~ What is your occupational status? (Check all that apply.)

- | | |
|--|---------------------------------------|
| <input type="checkbox"/> Work full-time outside the home | <input type="checkbox"/> Student |
| <input type="checkbox"/> Work part-time outside the home | <input type="checkbox"/> Retired |
| <input type="checkbox"/> Full-time homemaker | <input type="checkbox"/> Disabled |
| <input type="checkbox"/> Homemaker with part-time employment | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Unemployed | _____ |

~~44-13.~~ If you are a student, what type of school do you attend (undergraduate, graduate, technical, vocational, business)? _____

Full-time _____ Part-time _____

~~45-14.~~ Without giving your place of employment, please state your current occupation:

Juror No: _____

~~16.~~15. Check the following category that best describes your employer:

<input type="checkbox"/> Federal government agency	<input type="checkbox"/> Private, for-profit organization
<input type="checkbox"/> State government agency	<input type="checkbox"/> Private, not-for-profit organization
<input type="checkbox"/> County government agency	<input type="checkbox"/> Self employed
<input type="checkbox"/> City government agency	<input type="checkbox"/> Other: _____

~~17.~~16. Describe what you do: _____

How long have you held this job? _____

~~18.~~17. Please list all prior occupations or jobs during the past 5 years:

<u>Occupation</u>	<u>Length of Employment</u>

~~19.~~18. Are you a vendor or a contractor for the United States Government or do you work for one?Yes ☐ No ☐

If yes, please describe:

~~20.~~19. What is your spouse/domestic partner/significant other's occupational status?
(Check all that apply.)

<input type="checkbox"/> Work full-time outside the home	<input type="checkbox"/> Student
<input type="checkbox"/> Work part-time outside the home	<input type="checkbox"/> Retired
<input type="checkbox"/> Full-time homemaker	<input type="checkbox"/> Disabled
<input type="checkbox"/> Homemaker with part-time employment	<input type="checkbox"/> Other: _____

Juror No: _____

____ Unemployed _____

~~21.~~20. Check the following category that best describes your spouse/domestic partner/significant other's employer:

____ Federal government agency	____ Private, for profit organization
____ State government agency	____ Private, not-for-profit organization
____ County government agency	____ Self employed
____ City government agency	____ Other: _____

~~22.~~21. Without giving the place of employment, what is your spouse/domestic partner/significant other's current occupation/job title?

~~23.~~22. What kind of work did he/she do in the past? _____

~~24.~~23. Check the highest level of education for you and your spouse/domestic partner/significant other:

	<u>You</u>	<u>Spouse/domestic partner</u>
(a) Grade school or less	_____	_____
(b) Some high school	_____	_____
(c) High school graduate	_____	_____
(d) Technical or business school	_____	_____
(e) Some college	_____	_____
(f) College degree	_____	_____
(g) Graduate work or degree	_____	_____

If you attended college or received a graduate degree, identify all colleges and graduate schools you attended.

~~25.~~24. Do you have any education, training or employment experience in any of the following fields:

	<u>Yes</u>	<u>No</u>	<u>Some</u>
(a) Security, intelligence	_____	_____	_____

Juror No: _____

(b)	Private investigations	_____	_____	_____
(c)	Law	_____	_____	_____
(d)	Medicine	_____	_____	_____
(e)	Psychology, psychiatry or social work	_____	_____	_____
(f)	Corrections (work in prisons/jails)	_____	_____	_____
(g)	Religion and/or philosophy	_____	_____	_____
(h)	Criminal justice	_____	_____	_____
(i)	Journalism, media, communications	_____	_____	_____
(j)	Computer or information technology	_____	_____	_____
(k)	Law enforcement	_____	_____	_____

If yes, please explain the nature and extent of the education, training or employment experience: _____

26.25. Does your spouse/domestic partner/significant other, or another member of your immediate family have any education, training or employment experience in any of the following fields:

	<u>Yes</u>	<u>No</u>	<u>Some</u>
(a) Security, intelligence	_____	_____	_____
(b) Private investigations	_____	_____	_____
(c) Law	_____	_____	_____
(d) Medicine	_____	_____	_____
(e) Psychology, psychiatry or social work	_____	_____	_____
(f) Corrections (work in prisons/jails)	_____	_____	_____
(g) Religion and/or philosophy	_____	_____	_____
(h) Criminal justice	_____	_____	_____
(i) Journalism, media, communications	_____	_____	_____
(j) Computer or information technology	_____	_____	_____
(k) Law enforcement	_____	_____	_____

If yes, please explain the nature and extent of the education, training or employment experience: _____

MENTAL HEALTH HISTORY

27.26. Have you ever received in-patient treatment, or been under a doctor's care, for any type of mental or psychiatric condition, including mood disorders, ~~or for treatment for alcoholism or drug abuse?~~

Commented [A5]: The government objects to the inclusion of questions about drug and alcohol abuse treatment in the juror questionnaire.

Juror No: _____

Yes _____ No _____ Unsure _____

Please explain: _____

EXPERIENCE WITH WEAPONS OR EXPLOSIVES

27. Do you own ~~any~~

~~firearms?~~

Yes _____ No _____

(a) If yes, how many and what kind? _____

28. Do you have a license to own a firearm?

Yes _____ No _____

29. Does anyone have a permit to carry a concealed weapon (CCW / CPL)?

Yes _____ No _____

30. Do you have experience or training with explosive devices?

Yes _____ No _____

Please explain: _____

31. Please explain your view on whether citizens should have the right to bear arms.

(a) ~~In your view, are there any legitimate constraints on this right?~~ Do you believe the
government may impose restrictions on a citizen's right to bear arms? _____

Commented [A6]: The government objects to this wording and proposes this alternative: "Do you believe the government may impose restrictions on a citizen's right to bear arms?"

Juror No: _____

Juror No: _____

32. Do you belong to any organization that does advocacy concerning the Second Amendment or gun control?

Yes ____ No ____

Please explain: _____

MILITARY SERVICE

33. Have you or your spouse/partner ever served in the armed forces, including the reserves, National Guard or ROTC?

Yes ____ No ____

If yes, please answer the following:

	<u>You</u>	<u>Spouse/ Partner</u>
(a) Branch and highest rank	_____	_____
(b) Dates of service	_____	_____
(c) Place of Service	_____	_____
(d) Type of Discharge	_____	_____
(e) Any experience with courts martial, military police, shore patrol or other area of military law enforcement?	_____	_____
(f) Did you or they have any combat experience?	_____	_____

If so, identify location and years: _____

ORGANIZATIONAL AFFILIATIONS, HOBBIES AND SPARE TIME ACTIVITIES

33-34. Please list organizations to which you or your spouse or domestic partner belong or in which either of you participate, either now or in the past five years. (Include any civic, social, religious, charitable, volunteer, political, sporting, professional, business, union, fraternal and recreational groups, such as, but not limited to, Kiwanis, Rotary Club, Exchange Club, Knights of Columbus, Veterans of Foreign Wars, American Legion, American Civil Liberties Union, National Rifle Association, League of Women Voters).

Juror No: _____

Self: _____

Spouse/domestic partner: _____

~~34-35.~~ Have you ever held an office or title in any of the organizations you listed in question 33?

Yes ____ No ____

If yes, please list: _____

~~35-36.~~ Have you, any member of your family, or any close personal friend ever held an elected or appointed office in the federal, state or local government?

Yes ____ No ____

If yes, please describe: _____

~~36-37.~~ Have you, any member of your family, or any close personal friend ever belonged to a militia?

Yes ____ No ____

~~37-38.~~ If so, what was the name of that militia? _____

~~38-39.~~ Have you or any member of your family, ever run for elected office?

Yes ____ No ____

~~39-40.~~ If so, what office and party affiliation was involved? _____

Juror No: _____

~~40.~~41. During the 2020 COVID-19 ~~lockdowns~~restrictions on activities, was your employment impacted? If so, how?

Commented [A7]: The government objects to the use of the term “lockdowns” in the juror questionnaire. This is an emotionally loaded term for some people. As an alternative, the government suggests “restrictions on activities.”

~~41.~~42. During the 2020 COVID-19 ~~lockdowns~~restrictions on activities, was your employment impacted? If so, how?

~~42.~~43. Do you have any concerns relating to COVID-19 which would prevent you from being able to serve as a juror during ~~a 6 to 8 week~~ trial?

Commented [A8]: The government objects to references to the length of trial being included in the questionnaire. Conveying this information could corrupt the completion of the questionnaires by prompting prospective jurors to alter their answers to fit their interests in serving or not serving on the jury.

~~43. Please explain your views on a citizen’s freedom on speech, association, and religion.~~

Commented [A9]: The government objects to this question. It seems focused on communicating a possible defense theme, not on collecting information from prospective jurors. Moreover, it is so broad that most prospective jurors will have trouble determining what constitutes a “complete” answer.

Juror No: _____

PRIOR JURY SERVICE

44. Have you served as a juror before?

Yes _____ No _____

(a) If yes, please complete the following for each trial on which you served as a juror:

When did you serve?	In what court?	Criminal or Civil?	Charges/ Allegations?	What verdict did the jury reach?
1.				
2.				
3.				

(b) Have you ever served as a jury foreperson?

Yes _____ No _____

(c) Was there anything about your jury experience that left you disappointed or dissatisfied with our justice system?

Yes _____ No _____

Please explain: _____

(d) Was there anything about your experience as a juror which would make you not want to serve again?

Yes _____ No _____

Please explain: _____

(e) Have you served on a grand jury?

Juror No: _____

Yes _____ No _____

If yes, please state where, what court, and when (dates) served: _____

45. Do you know of any reason that would keep you from serving fairly and impartially as a juror in a case in which the defendant was a person whose race was different than yours?

Yes _____ No _____

If yes, please explain: _____

HOW DO YOU GET YOUR INFORMATION/ARE YOU AN INFORMATION PROVIDER?

46. (a) How often do you read a newspaper ?
____ Every day
____ Several times a week
____ Once or twice a week
____ Less often than once a week
____ Never
- (b) How often do you watch TV news?
____ Every day
____ Several times a week
____ Once or twice a week
____ Less often than once a week
____ Never
- (c) How often do you listen to radio news?
____ Every day
____ Several times a week
____ Once or twice a week
____ Less often than once a week
____ Never
- (d) How often do you get news off the Internet?
____ Every day

Juror No: _____

- _____ Several times a week
- _____ Once or twice a week
- _____ Less often than once a week
- _____ Never

Please list all sources of news you watch, listen to, or read on a regular basis, in print or on television, radio or the internet, including the names of any particular news programs or internet sites. Include radio talk shows.

47. Do you have regular access to the Internet?

Yes _____ Yes, but only at work _____ No _____

If yes, or yes, but only at work, about how often do you access the Internet?

- _____ Stay connected for extended periods throughout the day
- _____ A few times a day
- _____ Daily
- _____ A few times a week
- _____ A few times a month
- _____ A few times a year

48. Do you maintain, edit, or contribute to any newspapers, magazines, journals, blogs, twitter accounts, or other sources of news?

Yes _____ No _____

If yes, please explain: _____

49. Do you maintain any websites?

Yes _____ No _____

If yes, what are the addresses: _____

Juror No: _____

50. Do you subscribe to any email lists or message servers?

Yes ____ No ____

If yes, please specify: _____

51. Do you subscribe to any social media networks, such as Facebook, ~~Myspace~~Telegram, ~~SnapChat~~, LinkedIn or Twitter?

Yes ____ No ____

If yes, please specify: _____

52. Have you written any letters to the editor or articles/blogs/tweets about politics?

Yes ____ No ____

If yes, please provide the names of the articles and where they appeared: _____

53. What has been the content of your letters/articles/blogs/tweets? _____

54. If you are chosen to be a juror, and while jury selection is in process, you will not be permitted to read or listen to any media or Internet coverage of this case and related subjects. Will you be able to comply with these restrictions?

Yes ____ No ____

If no, please explain: _____

55. If you are chosen to be a juror, and while jury selection is in process, you will be

Juror No: _____

instructed to refrain from blogging, tweeting, posting on Facebook or other social networks, talking, or otherwise communicating about this case. Is there any reason why you cannot follow this instruction?

Yes _____ No _____

If yes, please explain: _____

56. Do you have any bumper stickers on your car?

Yes _____ No _____

If yes, what to they say? _____

CONTACT AND EXPERIENCES WITH CRIME, COURTS, LEGAL SYSTEM, AND LAW ENFORCEMENT

57. Are you, or is any close friend or relative, a member of a neighborhood crime watch or prevention group?

Yes _____ No _____

If yes, please identify the group and describe that participation: _____

58. Have you, or has any member of your family or close friend or relative, ever been the victim of, or witness to a crime, whether or not that crime was reported to law enforcement authorities?

Yes _____ No _____

(f) If no, go to the next numbered question. If yes, please provide the following information for each person and incident:

Juror No: _____

<u>Relationship</u> <u>(Self, sister,</u> <u>etc.)</u>	<u>Type of</u> <u>Crime</u>	<u>Victim or</u> <u>Witness</u>	<u>Reported</u> <u>to Police?</u>	<u>Was</u> <u>anyone</u> <u>Caught?</u>	<u>Outcome</u> <u>of the</u> <u>Case</u>

(g) In what ways, if any, did any of these incidents that you, or a person close to you, experienced affect your attitude about crime? _____

(h) How do you feel about how the police or law enforcement authorities handled the situation? _____

~~59. Have you ever been the subject of a search by law enforcement, with or without a warrant?~~

~~Yes _____ No _____~~

~~If yes, please describe: _____~~

~~_____~~

~~_____~~

Commented [A10]: The government objects to this question. Any "yes" answers to this question would be captured in the following question.

Juror No: _____

~~60.~~59. Have you, or has any member of your family or close friend, ever been: (1) questioned about, (2) accused of, (3) investigated for, (4) arrested for, (5) charged with (6) or convicted, of a crime, other than a minor traffic offense?

Yes _____ No _____

(i) If yes, please provide the following:

<u>Relationship of person charged (Self, Sister, etc.)</u>	<u>Crime(s) charged</u>	<u>Case Outcome</u>

(j) If yes, please provide a brief description of the alleged crime(s) and the events leading up to the accusation, arrest or charge: _____

(k) How did you feel about the experience(s) you describe? _____

(l) Would this experience affect your ability to serve as a juror in this case?

Yes _____ No _____

Please explain: _____

~~61.~~60. Have you ever appeared in court, or in any legal proceeding, as a plaintiff, defendant, victim, or witness for any reason other than explained above?

Yes _____ No _____

If yes, please state when and explain why you appeared in court: _____

Juror No: _____

~~62-61.~~ Have you ever had an unfavorable experience with a lawyer or judge?

Yes ____ No ____

If yes, please explain: _____

~~63-62.~~ Have you, or any member of your family, made or brought any claims or lawsuits against any federal, state, or local government agency?

Yes ____ No ____

If yes, please explain: _____

~~64-63.~~ Have any claims or lawsuits ever been made by any federal, state or local official or government agency against you, or any member of your family?

Yes ____ No ____

If yes, please explain: _____

~~65-64.~~ Have you ever been questioned in any matter by a local, state, or federal law enforcement agency, including any police or sheriff's office, the Federal Bureau of Investigation (FBI), the Drug Enforcement Administration (DEA), the Bureau of Alcohol, Tobacco, and Firearms (ATF), the Department of Justice, the Department of Homeland Security, the Internal Revenue Service (IRS), or the Bureau of Immigration and Customs Enforcement (ICE), formerly known as the Immigration and Naturalization Service (INS)?

Yes ____ No ____

If yes, please explain: _____

~~66-65.~~ Do you personally, or in connection with your business, have any pending interest

Juror No: _____

in any legal action or dispute with the United States, or any officer, agents, or employees of the United States (for example, a tax audit, social security dispute, etc.), or have you had any such dispute in the past?

Yes _____ No _____

If yes, please explain: _____

~~67-66.~~ Do you have any strong feelings about local, state and federal law enforcement?

Yes _____ No _____

If yes, please explain: _____

GENERAL OPINIONS AND BELIEFS ABOUT THE CRIMINAL JUSTICE SYSTEM

~~68. Do you believe that if the prosecution brings a person to trial, that person is probably guilty?~~

~~Yes _____ No _____ Unsure _____~~

~~69. Do you believe that innocent people are sometimes convicted of crimes they did not commit?~~

~~Yes _____ No _____ Unsure _____~~

YOUR KNOWLEDGE OF THIS CASE

~~70. Have you read or heard any news coverage or received any information from any source regarding a criminal case in Michigan relating to allegations involving a plot to kidnap the Governor of Michigan or involving a group known as the "Wolverine Watchmen"?~~

~~Yes _____ No _____~~

~~If yes, what have you read/heard: _____~~

Commented [A11]: The government objects to this entire subsection. First, it will reveal that this is a criminal case, and the government's position is that this should be a general questionnaire that does not reveal information about the case. Second, both of these questions seem focused more on communicating a defense theme than on gathering information to discuss during voir dire.

Commented [A12]: The government objects to the inclusion of this subsection. It will reveal to prospective jurors the nature of the case.

Juror No: _____

~~71. Do you know, or have you had any contact whatsoever with, the defendants Adam Fox, Barry Croft, Kaleb Franks, Brandon Caserta, Daniel Harris, or Ty Garbin?~~

~~Yes _____ No _____~~

~~If yes, please explain: _____~~

~~72. How much have you heard about this case?~~

~~_____ A lot about the case~~

~~_____ Some~~

~~_____ Very little about the case~~

~~_____ Nothing at all~~

~~73. How closely have you followed the news about this case?~~

~~_____ Very closely~~

~~_____ Somewhat closely~~

~~_____ Not very closely~~

~~_____ Not at all~~

~~74. Please indicate from what source(s) you heard about the case. (Check as many as apply):~~

~~☐ Television ☐ Newspapers ☐ Radio ☐ Internet~~

~~☐ Personal knowledge of accused, or his family, friends or acquaintances~~

~~☐ Personal conversations with others in the community~~

~~☐ Overheard others discussing case~~

~~☐ Other sources of information. List: _____~~

~~Please describe as completely as possible what you have heard about this case. _____~~

~~75. Have you heard any statements by any U.S. government officials or the prosecutors concerning the Defendants?~~

Juror No: _____

~~Yes _____ No _____ Unsure _____~~

~~If yes, please explain: _____~~

~~_____~~

~~76. Have you heard any statements by the defense attorneys about the Defendants?~~

~~Yes _____ No _____ Unsure _____~~

~~If yes, please explain: _____~~

~~_____~~

~~77. Based on what you have read, heard or seen in the media, please tell us if you have formed any feelings or opinions about this case or about the defendants, or about what the outcome should be? _____~~

~~_____~~

~~78. Based on what you have read, heard, or seen in the media, is there any reason why you could not sit as a fair and impartial juror in this case?~~

~~Yes _____ No _____ Unsure _____~~

~~Please explain: _____~~

~~_____~~

~~79. Despite any views you have formed, can you decide this case based solely on the evidence presented at trial?~~

~~Yes _____ No _____ Unsure _____~~

~~Please explain: _____~~

~~_____~~

~~80. Does the fact that this case involves allegations of crime with the potential for violence, cause you to question whether you can sit as a fair and impartial juror?~~

~~Yes _____ No _____~~

Juror No: _____

If yes, please explain: _____

CRIMINAL TRIAL PROCEDURES

81. ~~Under our United States Constitution, the defendants are presumed to be innocent, and cannot be found guilty of any offense unless and until the government proves each element of that offense beyond a reasonable doubt. Do you accept this principle and agree to apply it?~~

Yes _____ No _____

82. ~~The defendants are not required to testify or to present their side of the story to the jury. Under our United States Constitution, the defendants have the absolute right to remain silent, and the jury may not consider the fact that they choose not to testify as any evidence against them. Do you understand that the defendants' silence may not be held against them, and that you may not consider it in your deliberations?~~

Yes _____ No _____

83. ~~At the conclusion of the case, it is the Court's duty to instruct you on the law and explain to you the elements of the crimes charged in the indictment. Do you have any personal, religious, philosophical, or other beliefs as to what the law is or should be that would make it difficult for you to follow the instructions of the Court?~~

Yes _____ No _____

If yes, please explain: _____

84. ~~The jury must not consider the issue of punishment when deciding whether the defendants are guilty or not guilty. Can you remove the consideration of punishment from your decision?~~

Yes _____ No _____

Commented [A13]: The government objects to this entire subsection. First, it will reveal that this is a criminal case, and the government's position is that this should be a general questionnaire that does not reveal information about the case. Second, both of these questions seem focused more on communicating defense themes than on gathering information to discuss during voir dire.

Juror No: _____

If no, please explain: _____

_____**MEDICAL/HEALTH/HARDSHIP/CONFLICTS**

~~It is expected that the trial will last approximately six to eight weeks. The hours of the trial will typically be 9:00 a.m. to 2:00 p.m., Monday through Friday. Jurors will be paid an attendance fee of \$40 per day, and transportation costs will be reimbursed.~~

~~Jury service is one of the highest duties and privileges of a United States citizen. The participation of people like yourself is essential to the proper administration of justice. The Court recognizes that not everyone can serve on a case of this length. However, mere inconvenience or the usual financial hardships of jury service will not be enough to excuse you from service. You must show that service as a juror in this case would cause an unacceptable personal hardship. With this in mind, please answer the following questions.~~

Commented [A14]: The government objects to the inclusion of these preamble paragraphs. They reveal details about the expected length of trial that could corrupt the way that prospective jurors answer the questions.

85-67. Do you have any medical condition that would make it difficult for you to serve as a juror?

Yes _____ No _____

If yes, please explain: _____

86-68. Are you currently taking any prescription medication which may prevent you from giving your full attention to the matters in court during a trial?

Yes _____ No _____

If yes, please explain: _____

87-69. What is the condition of your hearing?

- _____ No problems at all
_____ Have difficulty hearing
_____ Have problems, but they are corrected with a hearing aid.

Juror No: _____

If you have problems, please explain: _____

~~88.~~70. What is the condition of your eyesight?

- ☐ No problems at all
☐ Have difficulty seeing
☐ Have problems, but they are corrected by glasses or contact lenses

If you have problems, please explain: _____

~~89.~~71. Do you have any specific problems concentrating or dealing with stress or pressure?

Yes _____ No _____

If you have problems, please explain: _____

~~90.~~72. Do you have any personal, professional, or financial obligations that would prevent you from giving your full attention or prevent you from being present in Court for the duration of the trial, i.e., a prepaid vacation, medical procedure, problem with seasonal employment?

Yes _____ No _____

If yes, please explain: _____

~~91.~~73. Is there anything else that you want to bring to the attention of the Court or that you think the Court or the lawyers should know about you that may affect your jury service in this case, or that may influence your ability to fairly and impartially judge the evidence in this case and to apply the law as instructed by the Court?

Yes _____ No _____

If yes, please explain: _____

Juror No: _____

~~92.~~74. Do you have any personal reason for wanting to serve as a juror in this case?

Yes _____ No _____ Not Sure _____

If yes, please explain: _____

~~93.~~75. Is there anything you would prefer to discuss privately with the judge?

Yes _____ No _____

PERSONAL KNOWLEDGE OF COURT/STAFF/ATTORNEYS/WITNESSES

~~94.~~ Do you know or recognize the judge in this case, Robert Jonker, or any of his staff?

~~Yes _____ No _____~~

~~If yes, please give details: _____

 _____~~

~~82.~~ Do you know or recognize any of the attorneys in this case, Joshua Blanchard, Christopher Gibbons, Julia Kelly, Karen Boer, Michael Hills, Scott Graham, Austin Hakes, or Nils Kessler?

~~Yes _____ No _____~~

~~If yes, please give details: _____

 _____~~

~~93.~~ Do you know or recognize any of the witnesses in this case, ~~lawyers, please provide names here~~?

~~Yes _____ No _____~~

~~If yes, please give details: _____

 _____~~

Commented [A15]: The government objects to the inclusion of any mention of court personnel, attorneys, and parties. Telling prospective jurors the names of the personnel that are involved in the case would allow them to easily determine which case is at issue. The government's position is that telling prospective jurors what the case is about would likely corrupt the process of jury selection. If prospective jurors know what the case is about before they begin completing a questionnaire, they may alter their answers to fit their own personal interests in either serving or not serving on the jury. Moreover, questions about knowledge of court, staff, and attorneys are routinely covered in voir dire. Affirmative answers are fairly rare and can be dealt with in court.

Juror No: _____

MISCELLANEOUS

~~94. If you are selected to serve as a juror on this case, would you be concerned about reactions to the verdict by anyone?~~

~~If yes, what kind of concern(s) do you have? Please explain: _____~~

~~95. Is there any matter not covered by this questionnaire that you think the Court or the attorneys might want to know about you when considering you as a juror in this case?~~

~~Yes _____ No _____ Not sure _____~~

~~Please explain: _____~~

~~96. Are you a smoker?~~

~~Yes _____ No _____~~

~~If yes, do you need to smoke more often than every two hours. Please explain:~~

Commented [A16]: The government objects to the inclusion of this miscellaneous section. The questions seem unlikely to produce detailed answers that will assist the parties in preparing for voir dire.

Juror No: _____

EXPLANATION SHEET

[illegible]

Juror No: _____

EXPLANATION, CONTINUED

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Juror No: _____

AFFIRMATION

I, _____, hereby declare under penalty of perjury that the foregoing answers set forth in this Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others or received assistance in completing the questionnaire. I have answered all of the above questions in this Jury Questionnaire myself.

Executed in the Western District of Michigan, on this ____ day of September, 2021.

Signature